INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

March 24, 2004

TO: Interested Parties / Applicant

RE: EIS Fibercoating, Inc / 017-18432-00039

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-17-3-4 and 326 IAC 2, this approval is effective immediately, unless a petition for stay of effectiveness is filed and granted, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3-7 and IC 13-15-7-3 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER- MOD.dot 9/16/03

March 24, 2004

Mr. Paul Rossemme
EIS Fibercoating, Inc.
616 East Main Street
Logansport, IN 46947

Re: 017-18432
First Minor Revision to
FESOP 017-15789-00039

Dear Mr. Rossemme:

EIS Fibercoating, Inc. was issued a FESOP on January 8, 2003, for a rubber extrusion and coating plant. A letter requesting changes to this permit was received on January 21, 2004. Pursuant to the provisions of 326 IAC 2-8-11.1 a minor permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of the addition of three (3) surface coating lines to the facility.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).

2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.

4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.

5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the minor permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0, extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original Signed by Paul Dubenetzky

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File - Cass County
U.S. EPA, Region V
Cass County Health Department
Air Compliance Section Inspector – Dave Rice
Compliance Data Section
Administrative and Development

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

EIS Fibercoating, Inc.
616 East Main Street
Logansport, Indiana 46947

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F017-15789-00039	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 8, 2003 Expiration Date: January 8, 2008

1st Minor Permit Revision No.: 017-18432	Pages Modified: 3, 5, 5a, 22, 23, 23a, 24, 32, 33, 34, 34a, 34b
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: March 24, 2004

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(2) Two (2) hot air curing ovens, using natural gas as the fuel, each with a maximum heat input rate of 7.36 MMBtu per hour, and venting through stacks L1-1, L1-2, L1-3, and L1-4.

(e) One (1) flock adhesive application line, identified as Nisco Line (constructed in 2002), with a maximum flock adhesive usage of 0.06 pounds per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as Nisco. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

(f) One (1) flock adhesive application line, identified as Lock Knob Line (constructed in 1987), with a maximum flock adhesive usage of 0.25 pounds per year, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as LK. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

(g) One (1) flock adhesive and surface coating application booth, identified as Overhead Conveyor Line (constructed in 1989), with a maximum primer usage of 0.75 pounds per hour, and flock adhesive usage of 1.5 pounds per hour, using drip and wipe or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as OH-1 and OH-2. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour, including the following:

(1) One (1) hot water boiler, with a maximum heat input of 0.15 MMBtu/hr.

(2) One (1) furnace, with a maximum heat input of 0.15 MMBtu/hr.

(3) One (1) furnace, with a maximum heat input of 0.4 MMBtu/hr.

(4) Three (3) space heaters, each with a maximum heat input of 0.15 MMBtu/hr.

(5) One (1) space heater, with a maximum heat input of 0.4 MMBtu/hr.

(6) One (1) space heater, with a maximum heat input of 0.35 MMBtu/hr.

(b) Electric infrared cure equipment.

(c) Paved and unpaved roads and parking lots with public access.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]

(a) Six (6) flock adhesive application lines with primer usage (identified as L1, L4, EL1, EL2, 3B2, and BL, and constructed in 1984, 1988, 1988, 1996, 1988, and 1987), each with a maximum primer usage of 0.04 gallons per hour and a maximum flock adhesive usage of 0.71 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L1, L4, EL1, EL2, 3B2, and BL, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse and vents inside the building.

(b) Four (4) flock adhesive application lines without primer usage (identified as L2, L3, L5, and L6, and constructed in 1987, 1987, 1988, and 1988), each with a maximum flock adhesive usage of 0.86 gallons per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through stacks L2, L3, L5, and L6, respectively. Each application line is equipped with a flocking operation, which is controlled by a baghouse and vents inside the building.

(c) One (1) flock and topcoat adhesive application line with two (2) coating booths (identified as L1-5 and L1-6), installed with the rubber extrusion line and constructed in 2002, using either drip and wipe method or HVLP type spray guns, and venting through stacks L1-5 and L1-6. This line is equipped with a flocking operation, which is controlled by a baghouse and vents inside the building.

(d) One (1) rubber extrusion line, with a maximum process rate of 1,000 pounds of rubber per hour, constructed in 2002, including the following:

(1) Two (2) rubber extruders.

(2) Two (2) hot air curing ovens, using natural gas as the fuel, each with a maximum heat input rate of 7.36 MMBtu per hour, and venting through stacks L1-1, L1-2, L1-3, and L1-4.

(e) One (1) flock adhesive application line, identified as Nisco Line (constructed in 2002), with a maximum flock adhesive usage of 0.06 pounds per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as Nisco. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

(f) One (1) flock adhesive application line, identified as Lock Knob Line (constructed in 1987), with a maximum flock adhesive usage of 0.25 pounds per year, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as LK. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

(g) One (1) flock adhesive and surface coating application booth, identified as Overhead Conveyor Line (constructed in 1989), with a maximum primer usage of 0.75 pounds per hour, and flock adhesive usage of 1.5 pounds per hour, using drip and wipe or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as OH-1 and OH-2. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 FESOP [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP):

(a) The amount of VOC delivered to all the adhesive application lines, primer application at the Overhead Conveyor line plus the amount of VOC used for clean-up shall be limited to less than 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The amount of any single HAP delivered to all the adhesive application lines, primer application at the Overhead Conveyor line plus the amount of any single HAP used for clean-up shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The amount of any combination of HAPs delivered to all the adhesive application lines, primer application at the Overhead Conveyor line plus the amount of any combination of HAPs used for clean-up shall not exceed 20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(d) The total rubber input to the rubber extruders shall not exceed a total of 4,380 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to 8.67 tons per year of VOC emissions and 4.4 tons per year of total HAPs emissions from the rubber extrusion and curing processes

Combined with the emissions from insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons per year, and the HAP emissions from the entire source are limited to less than 10 tons per year for a single HAP, and less than 25 tons per year for any combination of HAPs. The PM10 emissions from the flock adhesive application lines will be controlled using filters and baghouses, such that the PM10 emissions from the entire source (including PM10 emissions from insignificant emission units) will be less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 are not applicable.

D.1.2 VOC Emissions [326 IAC 8-1-6] and [326 IAC 2-8-11.1]

(a) Pursuant to permit # 017-15417-00039, issued on June 21, 2002, the total VOC input to the flock adhesive and topcoat application line installed with the rubber extrusion line and coating booths #L1-5 and L1-6 shall not exceed 16 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The potential to emit of VOC from each of the flock adhesive application lines # L1, L2, L3, L4, L5, L6, EL1, EL2, 3B2, Nisco, Lock Knob, and BL is less than 25 tons per year. Any change or modification which may increase the potential to emit from each of the adhesive application line to 25 tons per year or more of VOC must be approved by the Office of Air Quality before any such change may occur.

Therefore, the requirements of 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) are not applicable.

(c) The total VOC input to the Overhead Conveyor Line (including primer and adhesive application) shall not exceed 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This shall ensure that 326 IAC 2-8-11.1(e) is not applicable.

D.1.3 Particulate Matter (PM) [40 CFR 52, Subpart P]

Pursuant to 40 CFR 52, Subpart P, the PM from each of adhesive application line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.4 Particulate [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2(e) (Manufacturing Processes), the allowable particulate emissions from each rubber extruder shall not exceed 2.58 pounds per hour when operating at a process weight rate of 1,000 pounds per hour.

The pounds per hour limitation was calculated with the following equation:

Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

E = 4.10 P0.67 where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC and HAP usage limitations in Conditions D.1.1(a), (b), (c) and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a)by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC and HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.7 Particulate [326 IAC 6-3-2 (d)]

Pursuant to 326 IAC 6-3-2(d) and in order to comply with D.1.3, the dry filters and the baghouses for particulate control shall be in operation in accordance with manufacturer's specifications and control emissions from each flock adhesive application line at all times when these flock adhesive application lines are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stacks (L1, L2, L3, L4, L5, L6, EL1, EL2, 3B2, BL, L1-5, L1-6, Nisco, LK, OH-1, and OH-2) while one or more of the flock adhesive application lines or primer application line are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

D.1.9 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouses used in conjunction with the flocking operations, at least once per shift when the flocking operation are in operation when venting to the atmosphere. When for any one reading, the pressure drop across the baghouse is outside the normal range established during the latest stack test, the Permittee shall take reasonable response steps in accordance with Section C - Compliance Response Plan-Preparation, Implementation, Records, and Reports. A pressure reading that is outside the above mentioned range is not a deviation from this permit. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instrument Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: All the flock adhesive application lines, and primer application at Overhead Conveyor Line
Parameter: VOC input
Limit: Less than 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ❑ No deviation occurred in this quarter.
- ❑ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: All the flock adhesive application lines, and primer application at Overhead Conveyor Line
Parameter: Single HAP input
Limit: Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ❑ No deviation occurred in this quarter.
- ❑ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: All the flock adhesive application lines, and primer application at Overhead Conveyor Line
Parameter: Total HAPs input
Limit: Less than 20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ❑ No deviation occurred in this quarter.
- ❑ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: Flock adhesive and primer application at Overhead Conveyor Line
Parameter: VOC input
Limit: Less than or equal to 24.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- ❑ No deviation occurred in this quarter.
- ❑ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: Total flock adhesive and primer application at Nisco, Lock Knob, and Overhead Conveyor Line
Parameter: VOC input
Limit: Less than or equal to 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

YEAR:_____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

❑ No deviation occurred in this quarter.

❑ Deviation/s occurred in this quarter.

Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Permit Revision to a Federally Enforceable State Operating Permit

Source Background and Description

Source Name:	**EIS Fibercoating, Inc.**
Source Location:	**616 E. Main Street, Logansport, IN 46947**
County:	**Cass**
SIC Code:	**3069, 3089**
Operation Permit No.:	**017-15789-00039**
Operation Permit Issuance Date:	**January 8, 2003**
Permit Revision No.:	**017-18432**
Permit Reviewer:	**Madhurima D. Moulik**

The Office of Air Quality (OAQ) has reviewed a revision application from EIS Fibercoating, Inc. relating to construction and operation of three (3) additional surface coating lines.

History

EIS Fibercoating, Inc. was issued a FESOP on January 1, 2003. On January 21, 2004, EIS Fibercoating, Inc. submitted an application to add three (3) surface coating lines. The Nisco Line was installed and has been in operation since September 2002, and applies a flocking adhesive to plastic or rubber automotive parts in one booth and then applies the flock material to the parts. The Lock Knob Line was installed in 1987 but has not been in operation. This line applies a flocking adhesive to plastic or rubber automotive parts in one booth and then applies the flock material to the parts. The Overhead Conveyor Line was installed in 1989 but has not been in operation. This line has two (2) booths: one for primer application, and one for flocking adhesive application. The source has agreed to limit the potential to emit of VOC from the Overhead Conveyor Line to less than twenty-five (25) tons per year. In addition, the source has requested that the current FESOP limitations of 100 tons per year for VOC, ten (10) tons per year for individual HAP, and twenty-five (25) tons per year for any combination of HAPs still be applicable after the modification. The potential to emit of particulate matter shall be limited to less than 25 tons per year by using a combination cyclone/baghouse.

Unpermitted Emission Units and Pollution Control Equipment

The source consists of the following unpermitted facilities/units:

(1) One (1) flock adhesive application line, identified as Nisco Line (constructed in 2002), with a maximum flock adhesive usage of 0.06 pounds per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as Nisco. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

(2) One (1) flock adhesive application line, identified as Lock Knob Line (constructed in 1987), with a maximum flock adhesive usage of 0.25 pounds per year, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as LK. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

(3) One (1) flock adhesive and surface coating application booth, identified as Overhead Conveyor Line (constructed in 1989), with a maximum primer usage of 0.75 pounds per hour, and flock adhesive usage of 1.5 pounds per hour, using drip and wipe or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as OH-1 and OH-2. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

Existing Approvals

The source was issued a FESOP 017-15879-00039 on January 8, 2003.

Enforcement Issue

(a) IDEM is aware that equipment has been constructed and operated prior to receipt of the proper permit. The subject equipment is listed in this Technical Support Document under the condition entitled *Unpermitted Emission Units and Pollution Control Equipment.*

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the construction permit rules.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temperature (^{0}F)
Nisco	Nisco Line	21	1.0	2000	ambient
OH1	Overhead Line	21	1.5	5500	ambient
OH2	Overhead Line	21	1.5	5500	ambient
LK	Lock Knob Line	21	1.0	2000	ambient

Recommendation

The staff recommends to the Commissioner that the Minor Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on January 21, 2004.

Emission Calculations

(1) Potential to Emit of VOC:

Nisco Line:

Worst Case adhesive: FL 852
Usage = 0.06 gal/hr
VOC Content = 5.36 lb/gal
PTE of VOC = 0.06 gal/hr x 5.36 lb/gal x 8760 hr/yr x 1 ton/2000 lb = 1.4 tpy

Cleaner (guns and dips) (worst case): S1213
Usage = 0.06 gal/hr
VOC Content = 7.46 lb/gal
PTE of VOC = 0.06 gal/hr x 7.46 lb/gal x 8760 hr/hr x 1 ton/2000 lb = 1.96 tpy

PTE (total) of VOC = 3.36 tpy

Lock Knob Line:

Worst Case adhesive: FL 852
Usage = 0.25 gal/hr
VOC Content = 5.36 lb/gal
PTE of VOC = 0.25 gal/hr x 5.36 lb/gal x 8760 hr/yr x 1 ton/2000 lb = 5.86 tpy

Cleaner (guns and dips) (worst case): S1213
Usage = 0.25 gal/hr

VOC Content = 7.46 lb/gal
PTE of VOC = 0.25 gal/hr x 7.46 lb/gal x 8760 hr/hr x 1 ton/2000 lb = 8.17 tpy

PTE (total) of VOC = 14.03 tpy

Overhead Conveyor Line:

Worst Case adhesive: Nyatex 1127
Usage = 1.5 gal/hr
VOC Content = 0.89 lb/gal
PTE of VOC = 1.5 gal/hr x 0.89 lb/gal x 8760 hr/yr x 1 ton/2000 lb = 5.85 tpy

Worst case Primer: Nyatex Primer

VOC Content = 7.05 lb/gal
Usage = 0.75 gal/hr
PTE of VOC = 0.75 gal/hr x 7.05 lb/gal x 8760 hr/yr x 1 ton/2000 lb = 23.16 tpy

PTE of VOC (uncontrolled) = 29.01 tpy

PTE of VOC (Controlled) = 24 tpy

(2) Particulate Matter (PM/PM-10): Submitted by source.

Collection Efficiency of cyclone/baghouse combination = 99%
Flock Collected = 3.75 lb/hr each in Nisco, Lock Knob and Overhead Conveyor lines
Therefore, PM/PM-10 emissions from each = 3.75 lb/hr x 8760 hr/yr x 1 ton/2000 lb /99%
= 16.6 tons/yr

Total PM/PM-10 from 3 Lines = 49.8 tons per year

Controlled PM/PM-10 = 49.8 x (1-0.99) tpy = 0.5 tpy

Note: See Appendix A of this document for detailed HAP emission calculations.

Potential to Emit of the Revision Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	49.8
PM-10	49.8
SO_2	Negligible
VOC	46.4
CO	Negligible
NO_x	Negligible

HAPs	Potential to Emit (tons/yr)
Ethyl Benzene	1.10
MIBK	1.29
Toluene	21.70
Xylene	5.91
MDI	0.18
Glycol Ethers	1.14
Total	32.48

Justification for the Revision

The FESOP is being modified through a Minor Permit Revision. This revision is being performed pursuant to 326 IAC 2-8-11.1(d)(5), which states in part that a Minor Permit Revision is appropriate for "modifications for which the potential to emit is limited to less than twenty-five (25) tons per year of any regulated pollutant other than hazardous air pollutants", by complying with the following: "(A) Limiting total annual solvent usage or maximum volatile organic compound content, or both". 326 IAC 2-8-11.1(d)(5) also states that a Minor Permit Revision can be used if PM/PM-10 is limited to less than 25 tons per year by "(C) Using a particulate air pollution control device as follows: (I) achieving and maintaining 99% efficiency. (ii) Complying with a no visible emission standard. (iii) The potential to emit before air pollution controls does not exceed major source thresholds for federal permitting programs. (iv) Certifying to the commissioner that the air pollution control device supplier guarantees that a specific outlet concentration, in conjunction with design air flow, will result in actual emissions less than twenty-five (25) tons of particulate matter (PM) or fifteen (15) tons per year of particulate matter with an aerodynamic diameter less than or equal to ten (10) micrometers (PM-10)". The source has also agreed to retain the existing limits on source-wide HAP emissions for single and combination HAPs to 10 and 25 tons per year, respectively.

The addition of the emission units meet the above requirements, therefore, a minor permit revision will be issued.

Unrestricted Potential to Emit of the Source After Revision

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential to Emit (tons/yr) [1]
PM	282.2
PM-10	282.2
SO_2	0.03
VOC	246.7
CO	3.4
NO_x	4.1

HAPs	Potential to Emit (tons/yr) [1]
Ethyl Benzene	22.7
Carbon Disulfide	2.9
Acetophenone	0.9
Benzene	0.2
O-Xylene	0.2

Dibutyl Phthalate	3.74
MIBK	25.49
Toluene	24.88
Xylene	79.21
MDI	3.58
Glycol Ethers	5.64
Total	169.44

[1] Potential to emit = Potential to emit as calculated in TSD for F017-15789-00039 + potential to emit of the new units

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit [1] (tons/year)						
Process/Facility	PM	PM_{10}	SO_2	VOC	CO	NO_X	HAPs
6 Adhesive Application Lines with Primer (#L1, L4, EL1, EL2, 3B2, and BL)	Less than 15.0	Less than 15.0	—	Less than 90	—	—	Less than 10 for a single HAP and 20 for combined HAPs
4 Adhesive Application Lines without Primer (#L2, L3, L5, and L6)			—		—	—	
1 Adhesive Application Line with coating booths #L1-5 and L1-6			—		—	—	
Nisco Line	0.17	0.17					
Lock Knob Line	0.17	0.17		Nisco + Lock Knob + Overhead = (<25.0)			
Overhead Conveyor Line [2]	0.17	0.17		Overhead (24.0) [2]			
Rubber Extrusion	Negligible	Negligible	—	0.2	—	—	0.13
Rubber Curing	—	—	—	8.3	—	—	4.3 (No Xylene)
NG Curing Ovens	0.24	0.24	0.02	0.2	2.7	3.2	Negligible
Insignificant Activities	0.06	0.06	Negligible	0.05	0.7	0.8	Negligible
Total Emissions	Less than 16.5	Less than 16.5	0.02	Less than 100	3.4	4.1	Less than 10 for a single HAP and 25 for combined HAPs

[1] Limited PTE for permitted units are based on TSD for F017-15789-00039.

[2] The 24.0 tpy limit on the overhead conveyor has been included for the revision avoid 326 IAC 8-1-6. The 90.0 tpy limit included VOC emissions from the overhead conveyor line. The PM from Nisco, Lock Knob, and Overhead Lines should be limited to less than 25.0 tpy for this modification to qualify for a Minor Permit Revision.

County Attainment Status

The source is located in Cass County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Cass County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(b) Cass County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Proposed Revision

PTE from the proposed modification (based on 8760 hours of operation per year at rated capacity including enforceable emission control and production limit where applicable):

Pollutant	PM (ton/yr)	PM-10 (ton/yr)	SO_2 (ton/yr)	VOC (ton/yr)	CO (ton/yr)	NO_x (ton/yr)
Proposed Modification	0.5	0.5	-	41.4	-	-
PSD or Offset Threshold Level	250	250	250	250	250	250

This modification to an existing minor stationary source is not major because the emission increase is less than the PSD major source levels. Therefore, pursuant to 326 IAC 2-2, the PSD requirements do not apply.

Federal Rule Applicability

(a) The Nisco, Lock Knob, and Overhead Conveyor lines do not apply coatings to metal furniture or metal coils. Therefore, the modification is not subject to the requirements of the New Source Performance Standards (NSPS) Subpart EE – Standards for Metal Furniture Surface Coating, Subpart TT – Standards for Metal Coil Surface Coating.

(b) The Nisco, Lock Knob, and Overhead Conveyor lines do not apply coatings to metal cans, metal furniture, or miscellanous metal parts and products. Therefore, this modification is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) – Subparts KKKK, RRRR, or MMMM.

(c) This source applies surface coating to plastic parts, but the source has agreed to limit the emissions of HAPs to less than 10 tons per year for a single HAP and 25 tons per year for a combination of HAPs. Therefore, the source, which is not major for HAPs, is not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart PPPP – Standards for Plastics Parts Surface Coating Operation.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential to emit of all criteria polluants, afetr this modification, are less than 250 tons per year, and it is not one of the twenty-eight (28) listed source catgories. Therefore, 326 IAC 2-2 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Cass County and the potential to emit of VOC is less than 100 tons per year. Therefore, 326 IAC 2-6 is not applicable.

326 IAC 2-8 (FESOP)

The uncontrolled potential to emit of VOC and PM-10 emissions from this source are greater than 100 tons per year. The operation of baghouses will limit the PTE of PM-10 to less than 100 tons per year. The new Nisco, Lock Knob, and Overhead Conveyor Lines have total unresticted PM emissions below 40% of the total source PTE. Therefore, according to compliance guidelines, stack testing of these units is not necessary. The uncontrolled potential HAP emissions from this source are greater than 10 tons per year for a single HAP and greater than 25 tons per year for combination HAPs. Pursuant to 326 IAC 2-8-4, the following restrictions are necessary:

(a) The amount of VOC delivered to all the adhesive application lines, the Nisco line, the Lock Knob line, and the Overhead Conveyor line, plus the amount of VOC used for clean-up shall be limited to less than 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the emissions from insignificant activities, the VOC emissions from the entire source are limited to less than 100 tons per year.

(b) The amount of any single HAP delivered to all the adhesive application lines, the Nisco Line, the Lock Knob Line, the Overhead line, plus the amount of any single HAP used for clean-up shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The amount of any combination of HAPs delivered to all the adhesive application lines, the Nisco line, the Lock Knob line, and the Overhead Conveyor line, plus the amount of any combination of HAPs used for clean-up shall not exceed 20 tons per twelve (12) consecutive month period with compliance determined at the end of each month. Combined with the emissions from insignificant activities, the HAP emissions from the entire source are limited to less than 25 tons per year for any combination of HAPs.

Combined with the emissions from insignificant activities, the VOC and PM-10 emissions from the entire source are limited to less than 100 tons per year each, and the HAP emissions from the entire source are limited to less than 10 tons per year for a single HAP and less than 25 tons per year for any combination of HAPs. Therefore, the requirements of 326 IAC 2-7 are not applicable.

326 IAC 2-8-11.1 (FESOP Revisions)

The total uncontrolled potential VOC emission from the Nisco, Lock Knob and Overhead Conveyor Lines is greater than 25 tons per year and that of a single HAP (toluene) is greater than 10 tons per year. The source has agreed to limit the total potential VOC emissions from the Nisco, Lock Knob, and Overhead Conveyor Lines to less than 25.0 tons per year, and has requested that the source-wide limit of 10 tons per year for a single HAP still be valid. Therefore, this revision qualifies for a Minor Permit Revision under 326 IAC 2-8-11.1(d)(5).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The source-wide emissions for this source shall be limited to less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Process Operations)

The Nisco Line uses less than 5 gallons of flock adhesive each day, and is therefore exempt from 326 IAC 6-3-2.

The Lock Knob Line and the Overhead Conveyor Line each use more than 5 gallons of adhesives per day, and are therefore subject to the requirements of 326 IAC 6-3-2.

Pursuant to 326 IAC 6-3-2(d)(1), the Lock Knob Line and Overhead Conveyor Line shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the source shall operate the device in accordance with manufacturer's specifications.

Since this source is operating under a FESOP, the requirements of 326 IAC 6-3-2(d)(2) are not applicable.

The Lock Knob Line and the Overhead Conveyor Line are equipped with cyclone/baghouse combinations. Therefore, these lines are in compliance with 326 IAC 6-3-2(d)(1).

326 IAC 8-6 (Organic Solvent Emission Limitations)

This source is located in Cass County and was constructed after January 1, 1980. Therefore, 326 IAC 8-6 does not apply.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements)

The potential VOC emissions from the Nisco line and the Lock Knob line are each less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

The potential VOC emissions from the Overhead Conveyor line shall be limited to 24.0 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating)

This source applies flock adhesive and primers to rubber and plastic automotive parts only. Therefore, 326 IAC 8-2-9 does not apply.

Testing Requirements

No stack tests are required because compliance with the FESOP limits for VOC and HAP usage can be determined by evaluating Material Safety Data Sheets, keeping records of the amount of VOC and HAPs applied. The use of dry filters and baghouses ensures compliance with 326 IAC 6-3 (Manufacturing Processes) and 326 IAC 2-8 (FESOP).

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ in conjunction with the source, must develop specific conditions to

satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also in Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the approporiate corrective actions within a specific time period.

The compliance monitoring requirements applicable to the emission units added in this minor permit revision are as follows:

1. The Lock Knob line, and the Overhead Conveyor line have applicable compliance monitoring conditions as specified below:

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the stacks for the flock adhesive application lines while one or more of the adhesive applications lines are in operation.

(b) Monthly inspections shall be performed of the coating emissions from the stacks (OH-1, OH-2, and LK), and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for these units shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed.

(c) The Permittee shall record the total static pressure drop across the baghouses controlling the flocking operations, at least once per shift when the flocking operations are in operation and venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

(d) An inspection shall be performed within the last month of each calender quarter of all bags controlling the flocking operations when venting to the atmosphere. In the event that bag failure has been observed:

(1) for multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit.

(2) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit.

These monitoring conditions are necessary because the dry filters and the baghouses must function properly to ensure compliance with 326 IAC 6-3 (Process Operations) and 326 IAC 2-8 (FESOP).

Conclusion

The permit revision shall be added to the conditions of the FESOP as Minor Permit Revision No.: 017-18432-00039.

CHANGES TO THE FESOP

The FESOP has been modified as follows (~~strikeout~~ to show deletions and **bold** to show additions):

(1) Section A.2 and the facility description in Section D.1 is modified as follows:

(d)(2) Two (2) hot air curing ovens, using natural gas as the fuel, each with a maximum heat input rate of 7.36 MMBtu per hour, and venting through stacks L1-1, L1-2, L1-3, and L1-4.

(e) One (1) flock adhesive application line, identified as Nisco Line (constructed in 2002), with a maximum flock adhesive usage of 0.06 pounds per hour, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as Nisco. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

(f) One (1) flock adhesive application line, identified as Lock Knob Line (constructed in 1987), with a maximum flock adhesive usage of 0.25 pounds per year, using either drip and wipe method or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as LK. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

(g) One (1) flock adhesive and surface coating application booth, identified as Overhead Conveyor Line (constructed in 1989), with a maximum primer usage of 0.75 pounds per hour, and flock adhesive usage of 1.5 pounds per hour, using drip and wipe or HVLP spray guns, using dry filters for overspray control of particulates, and venting through a stack identified as OH-1 and OH-2. The line is also equipped with a flocking booth which is controlled by a baghouse and vents inside the building.

(2) Section D.1.1 is modified as follows:

D.1.1 FESOP [326 IAC 2-8-4]

Pursuant to 326 IAC 2-8-4 (FESOP):

(a) The amount of VOC delivered to all the adhesive application lines**, primer application at the Overhead Conveyor line** plus the amount of VOC used for clean-up shall be limited to less than 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The amount of any single HAP delivered to all the adhesive application lines**, primer application at the Overhead Conveyor line** plus the amount of any single HAP used for clean-up shall be limited to less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(c) The amount of any combination of HAPs delivered to all the adhesive application lines**, primer application at the Overhead Conveyor line** plus the amount of any combination of HAPs used for clean-up shall not exceed 20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(3) Section D.1.2 is modified as follows:

D.1.2 VOC Emissions [326 IAC 8-1-6] and **[326 IAC 2-8-11.1]**

(a) Pursuant to permit # 017-15417-00039, issued on June 21, 2002, the total VOC input to the flock adhesive and topcoat application line installed with the rubber extrusion line and coating booths #L1-5 and L1-6 shall not exceed 16 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(b) The potential to emit of VOC from each of the flock adhesive application lines # L1, L2, L3, L4, L5, L6, EL1, EL2, 3B2, **Nisco, Lock Knob,** and BL is less than 25 tons per year. Any change or modification which may increase the potential to emit from each of the adhesive application line to 25 tons per year or more of VOC must be approved by the Office of Air Quality before any such change may occur.

Therefore, the requirements of 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) are not applicable.

(c) The total VOC input to the Nisco Line, Lock Knob Line, and Overhead Conveyor Line (including primer and adhesive application) shall not exceed 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month. This shall ensure that 326 IAC 2-8-11.1(e) is not applicable.

(4) Section D.1.8 is modified as follows:

D.1.8 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the spray coating booth stacks (L1, L2, L3, L4, L5, L6, EL1, EL2, 3B2, BL, L1-5, ~~and~~ L1-6**, Nisco, LK, OH-1, and OH-2**) while one or more of the flock adhesive application lines **or primer application line** are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Preparation, Implementation, Records, and Reports in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(5) The FESOP Quarterly Report form for VOC input (source-wide except for insignificant units) is modified as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name:	EIS Fibercoating, Inc.
Source Address:	616 East Main Street, Logansport, Indiana 46947
Mailing Address:	616 East Main Street, Logansport, Indiana 46947
FESOP No.:	F017-15789-00039
Facility:	All the flock adhesive application lines, **and primer application at Overhead Conveyor Line**
Parameter:	VOC input
Limit:	Less than 90 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(6) The FESOP Quarterly Report for single HAP input (source-wide) is modified as follows

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name:	EIS Fibercoating, Inc.
Source Address:	616 East Main Street, Logansport, Indiana 46947
Mailing Address:	616 East Main Street, Logansport, Indiana 46947
FESOP No.:	F017-15789-00039
Facility:	All the flock adhesive application lines, **and primer application at Overhead Conveyor Line**
Parameter:	Single HAP input

Limit: Less than 10 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(7) The FESOP Quarterly Report for Total HAPs input (source-wide) is modified as follows:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: All the flock adhesive application lines, **and primer application at Overhead Conveyor Line**
Parameter: Single HAP input
Limit: Less than 20 tons per twelve (12) consecutive month period with compliance determined at the end of each month.

(8) A FESOP Quarterly Report form is added for the VOC limit on the Overhead Conveyor Line.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: EIS Fibercoating, Inc.
Source Address: 616 East Main Street, Logansport, Indiana 46947
Mailing Address: 616 East Main Street, Logansport, Indiana 46947
FESOP No.: F017-15789-00039
Facility: Flock adhesive and primer application at Overhead Conveyor Line
Parameter: VOC input
Limit: Less than or equal to 24.0 tons per twelve (12) conse cutive month period with compliance determined at the end of each month.

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

(9) A FESOP Quarterly Report form is added for the VOC limit (for Minor Permit Revision) on the Nisco, Lock Knob, and Overhead Conveyor Line.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: **EIS Fibercoating, Inc.**
Source Address: **616 East Main Street, Logansport, Indiana 46947**
Mailing Address: **616 East Main Street, Logansport, Indiana 46947**
FESOP No.: **F017-15789-00039**
Facility: **Total flock adhesive and primer application at Nisco, Lock Knob and Overhead Conveyor Line**
Parameter: **VOC input**
Limit: **Less than 25.0 tons per twelve (12) consecutive month period with compliance determined at the end of each month.**

YEAR:

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

No deviation occurred in this quarter.

Deviation/s occurred in this quarter.
Deviation has been reported on:

Submitted by:
Title / Position:
Signature:
Date:
Phone:

Attach a signed certification to complete this report.

Appendix A: Emission Calculations
HAP Emission Calculations

Company Name: **EIS Fiber coating, Inc.**
Address City IN Zip: **616 East Main Street, Logansport, IN 46947**
Permit Number: **017-18432**
Plt ID: **017-00039**
Permit Reviewer: **Madhurima D. Moulik**
Date: **13-Feb-04**

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Ethylbenzene	Weight % MIBK	Weight % Toluene	Weight % Xylene	Weight % MEK	Weight % MDI	Weight % Glycol Ethers	Weight % Dibutyl Phthalat	Ethyl Benzene Emissions (ton/yr)	MIBK Emissions (ton/yr)	Toluene Emissions (ton/yr)	Xylene Emissions (ton/yr)	MEK Emissions (ton/yr)	MDI Emissions (ton/yr)	Glycol Ethers Emissions (ton/yr)
Flocklok 852	8.08	0.310000	1.00	10.00%	11.80%	6.30%	25.90%	0.00%	1.60%	0.00%	0.00%	1.10	1.29	0.69	2.84	0.00	0.18	0.00
S1213 Blend	7.46	0.310000	1.00	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Nyatex Primer	7.35	0.750000	1.00	0.00%	0.00%	87.00%	8.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	21.01	1.93	0.00	0.00	0.00
Nyatex 1127	8.67	1.500000	1.00	0.00%	0.00%	0.00%	2.00%	0.00%	0.00%	2.00%	2.00%	0.00	0.00	0.00	1.14	0.00	0.00	1.14
Total State Potential Emissions										**PTE of HAPs (tons/yr) =**		**1.10**	**1.29**	**21.70**	**5.91**	**0.00**	**0.18**	**1.14**
METHODOLOGY										**Combination HAPs (tons/y**		**32.46**						

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Hapcalc.xls 9/95